

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|--|---|---------------------------|
| Lillian Roman, on behalf of plaintiff and a class, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | Case No.: 09 CV 5872 |
| |) | |
| Midland Credit Management, Inc., Midland |) | Judge Virginia M. Kendall |
| Funding LLC and Encore Capital Group, Inc., |) | |
| formerly MCM Capital Group, Inc., |) | |
| |) | |
| Defendants. |) | |

UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Defendants, Midland Credit Management, Inc., Midland Funding LLC and Encore Capital Group, Inc. (collectively "Midland") by their attorneys, David M. Schultz and Corinne C. Heggie, for their Agreed Motion for an Enlargement of Time of twenty-two (22) days to file their responsive pleadings to plaintiff's Complaint, states as follows:

1. On or about September 21, 2009, plaintiff filed a Complaint against defendants alleging that defendants violated the Fair Debt Collection Practices Act, ("FDCPA").
2. Midland Credit Management, Inc. and Midland Funding LLC were served September 28, 2009. Midland Credit Management, Inc.'s and Midland Funding LLC's responsive pleadings are due October 19, 2009.
3. Encore Capital Group, Inc. Midland was served October 1, 2009. Its responsive pleading is due October 21, 2009.
4. Defense counsel was recently contacted to represent Midland in this matter. Defense counsel is filing her appearance contemporaneously with this motion.
5. Since receiving this case, defense counsel has spoken with their client and examined the pleading.

6. The additional time requested is sought to afford defense counsel additional time to confer with the client, examine the facts of the case and prepare the appropriate responsive pleadings on behalf of each defendant.

7. This time is not meant for the purpose of unnecessary delay and will not prejudice any party to the litigation.

8. On October 16, 2009, defense counsel and one of the attorneys for plaintiff discussed the pleading date. Plaintiff's counsel does not oppose the relief sought herein.

WHEREFORE, Defendants, Midland Credit Management, Inc., Midland Funding LLC and Encore Capital Group, Inc., respectfully request that this Court grant them each twenty-two (22) days, up to and including November 10, 2009, to file their responsive pleadings to plaintiff's Complaint.

Respectfully Submitted,

/s/Corinne C. Heggie
One of the attorneys for Defendants,
Midland Credit Management, Inc., Midland
Funding LLC and Encore Capital Group, Inc.

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